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Attorneys for Plaintiff
SUSTAINABLE MODULAR MANAGEMENT, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, for the use and benefit of SUSTAINABLE MODULAR MANAGEMENT, INC., a Texas corporation

Plaintiff,

v.

JE DUNN CONSTRUCTION COMPANY;
FEDERAL INSURANCE COMPANY;
HARTFORD FIRE INSURANCE
COMPANY; TRAVELERS CASUALTY
AND SURETY COMPANY OF
AMERICA; DOE Individuals I-X and ROE
Entities I-X, inclusive,

Defendants.

Case No. 2:20-cv-00790-JAD-NJK

JOINT STIPULATION REGARDING
DEPOSITION SCHEDULE

Consistent with this Court's Order [Dkt. 95] regarding the Renewed Joint Stipulation and Order to Extend Discovery and Related Deadlines [Dkt.94], the Parties submit this Joint Stipulation Regarding Deposition Schedule. This stipulation is made by and between all parties to this consolidated action (United States of America, for the use and benefit of Sustainable Modular Management, Inc. ("SMM"); JE Dunn Construction Company ("JE Dunn"); Harford Fire Insurance Company ("Hartford"); Travelers Casualty and Surety Company of America ("Travelers"); Federal Insurance Company ("Federal"); and Pacific Indemnity Company ("Pacific") through their respective counsel (collectively, the "Parties.").

1. The schedule for completing all remaining depositions is as follows:

Deponent	Date	Location
Eli Kaldahl	April 18, 2023	Kansas City, Missouri
Craig Stearns	April 20, 2023	Kansas City, Missouri
Neal Gaudion	April 25, 2023	Phoenix, Arizona
Jeremy Bristol (Begin am)/ Rick Bartolotti (Begin pm)/	April 26, 2023	Phoenix, Arizona
Joe Waters (am)	April 27, 2023	Phoenix, Arizona
Kevin Purvis	May 8, 2023	Dallas, Texas
Kevin Finn	May 9, 2023	Dallas, Texas
Barry Bray	May 11, 2023	Zoom
Nick Mackie	May 17, 2023	Dallas, Texas
Bill Schwartzkopf	May 31, 2023	Denver, Colorado
Army Corps of Engineers Representative	Floating as non- party witness ¹	Little Rock, Arkansas (anticipated)

¹ Sustainable Modular Management plans to notice this deposition. The Assistant United States Attorney handling the scheduling of this deposition has not yet provided available dates for this deposition. Because this deposition involves a non-party, Government witness, SMM and JE Dunn have agreed to cooperate in setting this deposition once the Government provides available dates.

STIPULATION

NOW, THEREFORE, the Parties hereby stipulate and agree to the Deposition Schedule as described herein.

IT IS SO STIPULATED.

DATED this 7th day of April, 2023.

MORRIS LAW GROUP

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With respect to the deposition of the Army Corp of Engineers, Sustainable Modular Management must promptly provide the assigned AUSA with a copy of the order at Docket No. 95. A stipulation with a firm deposition date for the Army Court of Engineers must be filed by April 24, 2023.

ORDER

IT IS SO ORDERED.



United States Magistrate Judge

DATED April 10, 2023